BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAYMAN TO INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC. (DMA/USPS-T9-1-10)

The United States Postal Service hereby provides responses of witness Tayman to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS—T9—1–10, filed on July 29, 1997. A partial objection to interrogatory DMA/USPS—6(c) was filed on August 8, 1997. A declaration will be provided shortly.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Scott L. Reiter

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2999; Fax –5402 August 12, 1997

DMA/USPS-T9-1. Please refer to page 82 of Library Reference H-12.

- a. For 1997, personnel related other programs comprise 8,613 work years and for 1998 9,933 work years. Please describe the work that these personnel will be performing by cost segment.
- b. Please provide supporting detail for the basis for your work year estimates

- a. The workyears referenced are detailed by program in Chapter V, Section a., of LR H-12. A narrative description of each program and the basis for the resource requirement is contained in LR H-10.
- b. Supporting detail for each program's resource requirement is contained in LR H-10.

DMA/USPS-T9-2. Please refer to page 83 of Library Reference H-12.

a. For 1997, work years for HQ and service wide personnel-related other programs personnel are 62,235 and for 1998 they are 84,257 work years. Please describe the work that these personnel will be performing by cost segment and provide supporting detail for the basis for your work year estimates.

RESPONSE:

a. As specified on page 83 of LR H-12, the numbers you have referenced are expressed in thousands of dollars, not workyears. Program names, supporting calculations, and the number of workyears related to these costs can be found in Chapter V, sections.c. and f. A narrative description of each program and the basis for the resource requirement is contained in LR H-10.

DMA/USPS-T9-3. Please refer to pages 89 and 90 of LR H-12.

- a. For all costs on these sheets which are greater than \$10 million, please describe the programs that these costs support.
- b. Please provide the basis of your estimate.

- a. Program names and dollar amounts can be found in Chapter V, sections b. and e. of LR H-12 Supporting calculations for headquarters administered programs and corporatewide activities, and depreciation can be found in Chapter VI, Sections a. and e. of LR H-12. A narrative description of each program and the basis for the resource requirement is contained in LR H-10.
 - b. Please see my response to part a., above.

DMA/USPS-T9-4. Please refer to page 98 of LR H-12.

- a. For all costs on this sheet which are greater than \$10 million, please describe the programs that these costs support.
- b. Please provide the basis of your estimate.

RESPONSE:

a.&b. Please see my response to DMA/USPS-T-9-3.

DMA/USPS-T9-5. Please refer to page 100 of LR H-12.

- a. For all costs on this sheet which are greater than \$10 million, please describe the programs that these costs support.
- b. Please provide the basis of your estimate.

RESPONSE:

a.&b. Please see my response to DMA/USPS-T-9-3.

DMA/USPS-T9-6. Please confirm that page 101 of LR H-12 shows non personnel other program costs of \$248,264,000 in FY 97 and \$867,243,000 in FY 98. That page lists "Program/Functional Managers" as the sources of these cost estimates.

- a. Are there any work papers supporting these estimates? If so, please provide them.
- b. When did the managers provide these estimates?
- c Please provide the names and titles of each of the managers who provided the estimates together with the component number for which they provided the estimates.
- d. Please describe the activities that these costs will be incurred for.

RESPONSE:

Confirmed.

a. FY 97 program estimates reflect the approved budget which resulted from the Postal Service's budget process and FY 98 estimates reflect preliminary amounts from the FY 98 budget process. Workpapers similar to those typically provided to the Commission in support of most aspects of the rate filing which calculate the development of budgetary amounts are not available. The formulation of budget amounts is not based simply on mechanical calculations contained in a comprehensive set of workpapers. Instead, budgets are established through a complex management process that has incorporated the Postal Service's CustomerPerfect! philosophy. As a result, budget targets involve negotiation, judgment, linkage to and support of operating

goals, and the tactical allocation and re-allocation of resources to organizational units and programs.

- b. Estimates were provided for use in the Docket R97-1 rate case at various times between March and June 1997.
- c. A partial objection to this interrogatory was filed. Please refer to the attached schedule for the titles of the managers who provided the program estimates specified, and the component numbers to which they apply.
- d. A narrative description of each program and the basis for the resource requirement can be found in LR H-12.

Attachment to DMA/USPS-T9-6

The titles of the "Program/Functional Managers" who provided the non-personnel other program estimates specified, are listed below by the applicable components.

Title	Components
Manager, Operations Network Redesign	187
Manager, Marketing Infrastructure	165, 167, 168, 174, 177, 246, 211
Manager, Field Computing Service Centers	167, 168, 174, 177, 210
Manager, Stamp Distribution Network	180, 248
Assistant Inspector General for Employee Investigations	108, 165, 168, 174, 177, 211
Manager, Mail Transport Equipment	165, 175, 177
Manager, Service Center Operations	165, 167, 168, 170, 177
Manager, POS I	168, 174, 177, 169, 211
Manager, Expedited & Package Information Services	196
Manager, Workload & Productivity Analysis	210
Act. Manager, Operating Budget	170
Manager, Environmental Management Policy	169
Manager, Inplant Operations	1246, 81, 165, 167, 168, 169, 177
Manager, International Operations	142, 143, 146
Manager, Financial Administration Services	177
Act. Manager, Operations Process Redesign	177
Manager, Year 2000 Program	174
Manager, Expedited & Package Services	187
Manager, Service Management Policies	177, 174
Manager, Information Technology Plans and Standards	174
Manager, Address Management	177
Manager, Delivery Policies & Programs	177
Act. Manager, Vehicle Maintenance	99
Manager, Payroll Accounting/Records	174
Manager, Safety & Risk	174, 169
Manager, Business Mail Acceptance	174
Manager, Logistics	174

DMA/USPS-T9-7. Please refer to page 194 of LR H-12.

- a. Over what period of time does the Postal Service depreciate Mail Processing Equipment?
- b. Over what period of time does the Postal Service depreciate Real Property?
- c. Over what period of time does the Postal Service depreciate Motor Vehicles?
- d. Over what period of time does the Postal Service depreciate Customer Service Equipment?
- e. Over what period of time does the Postal Service depreciate Postal Support Equipment?
- f. What is the useful life of the equipment in a. through e. above?

- a. The Postal Service depreciates mail processing equipment over 10 years.
- b. The Postal Service depreciates real property over 40 years.
- c. Depending on the make and model, the Postal Service depreciates vehicles over periods ranging from 8-12 years.
- d. Depending on the type of equipment, the Postal Service depreciates customer service equipment over periods ranging from 5-10 years.
- e. Depending on the type of equipment, the Postal Service depreciates postal support equipment over periods ranging from 3-10 years.

	f.	The depreciation periods used by the Postal Service are based on the
estima	ited us	seful life of the equipment.
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DMA/USPS-T9-8. Please refer to page 519 of LR H-12. The September 30, 1996 Balance Sheet shows assets of \$25,463.9 million for property and equipment.

- Please disaggregate the allowances for depreciation and amortization of \$9,157.7 million to the amount for buildings, for equipment, and for leasehold improvements.
- b. Please provide a listing showing the valuation on the books for all buildings that The Postal Service owns in Washington, D.C., New York City, San Francisco, Los Angeles. For each building, please also indicate the year the Postal Service acquired the building.
- c. Please provide any information the Postal Service has pertaining to the market value of each of the buildings under b. above.

- a. Please see pages 528-536 of LR H-12 for the amount of accumulated depreciation and amortization by type of property and equipment.
- b. Please refer to the attached listing of owned buildings for the information requested.
- c. Postal Service buildings are carried on the books at historical costs net of accumulated depreciation in compliance with the Generally Accepted Accounting Principles (GAAP). The Postal Service does not maintain information related to the market value of its buildings since they are critical components of our operating infrastructure and not intended for sale.

2

UNITED STATES POSTAL SERVICE.

Owned Facilities for Selected Cities

Aug 1, 1997

Facility ID	Post Office	Unit Name	Street Address	5 7	Zprode	Eldy Oss Dt	Bldy Cost	Land Cost	Undep Stil
054529-G01	LOS ANGELES	BULK MAIL CENTER	6856 BANDINI BLVD	CA	B0201-9096	11/01/1975	26,600,175	9,434,565	14,624,560
054529-003	LOS ANGELES	BMC BLDG 111	8555 BANCHNI DI VD.	CA	90001-9995	67/ 01/1 972	46,000	184,600	
054528-Q84	LOS ANGELES	EMC BLDG 113	SEES BANDINI BLVD	ÇA	90201-9998	07/01/1972	165,281	134,500	
054539-237	LOS ANGELES	FOY STATION PARKING 2	UNKNOWN	CA	90517-		•	0	0
004530-Q02	LOS ANGELES	EAST LOS ANGELES STA	975 & ATLANTIC BLVD	CA	90022-0998	08/01/1940	879,365	16,000	
054530-003	LOS ANGELES	HOLLYWOOD STATION	1016 N WILCOX AVENUE	CA	90028-9998	04/01/1936	1,213,676	349,851	12,200
054530-005	LOS ANGELES	TERMINAL ANNEX	000 N ALAMEDA BTREET	CA	90054-9998	96/01/1940	21,555,259	3,366,035	165,656
65453D-G98	LOS ANGELES	BARRINGTON STATION	200 S. BARMINGTON AVENU	CA	90045-0984	0401/1970	3,302,682	860,000	
054630-G14	LOS ANGELES	BICENTENNIAL STATION	7610 BEVERLY BLVD	CA	9004E-9994	00/01/1976	1,343,361	1,467,572	730,291
054530-016	LOS ANGELES	PALMS STATION	3761 MOTOR AVENUE	CA	10034-0994	12/01/1967	5,169,020	1,804,447	4,047,095
054530-G17	LOS ANGELES	LOS FELIZACIONONT STATIO	1925 N VERMONT AVE	CA	90027-6099	10/01/1678	1,413,209	1,033,458	613,525
●84530-G22	LDS ANGELES	PREUSS STATION	1270 ALFRIED ST	CA	\$0035-8896	10/01/1978	893,041	363,791	541,246
054530-025	LOS ANGELES	CANVOOR STATION	265 B. WESTERN AVE	CA	10001-0008	05/01/1466	4,736,358	2,969,701	3,710,735
064639-028	LOS ANGELES	WAGNER BRANCH	2200 CENTURY BLVD.	CA	90047-4090	11/04/1988	1,610,919	662,047	1,411,460
954830-G31	LOS ANGELES	SUNSET STATION	1425 CHEROKEE AVE.	CA	90048-8008	91/01/1965	2,007,300	1,710,380	1,444,306
054530-(332	LOS ANGELES	WEST ADAM STATION	4980 W. WASHINGTON BLVO	CA	90016-0550	84/01/1988	2,125,771	1,084,834	1,640,401
064539-G33	LOS ANGELES	GREENWESTVERN	1616 VERNON AVE.	CA	100000-1998	10/01/1984	549,000	21 8.89 5	386,590
954530-G 5 0	LOS ANGELES	RANCHO PARK STATION	11270 EXPOSITION BLVD	CA	90064-8998	01/01/1992	12,723,708	5,738,293	11,166,631
954530-G42	LOS ANGELES	EAGLE ROOK STATION	7436 N Figueres	CA	90041-9906	03/01/1989	5,795,268	3,718,719	4,813,7 89
054530-G44	LOS ANGELES	WESTCHESTER STATION	UNKNOWN	CA	90045	-	9 ,114,599	3,005,436	8,909,903
054531-G35	LOS ANGELES	PAD CENTER	7001 B. CENTRAL AVE.	CA	90052-P356	1 1/01/1968	134,652,362	10,844,845	112,401,475
059025-306	LOS ANGELES	OLYMPIC MOD UNIT #4	NO ADDRESS	CA	9024-9990	06/01/1986	70,952	D	0
059004-008	LOB ANGELES	OLYMPIC MOD UNIT #9	NO ADDRESS	CA	90034-8668	06/01/1966	79,962		
069904-G18	LOS AMGELES	OLYMPIC MOD UNIT #18	NO ADDRESS	CA	90024-9696	06/01/1965	70,952		
059004-Q19	LOS ANGELES	OLYMPIC MODIUMY #1\$	NO ADDRESS	CA	90024-9998	06/01/1989	79,882		
670030-GP4	LOS ANGELES	HANCOCK STATION	8300 B VERMONY AVE	CA	90044-9994	10/01/1987	85,456	88,880	65,198
670034-GP5	LOS ANGELES	FOY STATION	1 406 W 7TH 8T.	CA	90017- 8686	06/G1/1906	130,844	227.033	130,544
670036-004	LOS ANGELES	WATTS STATION	18501 S. COMPTON AVE	CA	00002-5990	11/01/1981	85,414	.375 ,359	85,414
679036-GQ5	LOS ANGELES	GRIFFITH STATION	2370 GLENDALE BLVD	CA	90039-8946	08/01/1980	35,440	148,062	55,2 60
470036-G59	Los angeles	EDENDALE STATION	1325 ALVARADO ST	CA.	90026-0005	11/01/1969	#8,337	207,432	6 7,773
670036-GT2	LOS ANGELES	BROADWAY-MANCHESTER	8828 SOUTH BROADVIAY	CA	90903-0998	67/01/196 2	39 ,510	79,410	39,610
5 56765-GD1	SAN FRANCISCO	BULK MAIL CENTER	2501 RYDIN RD	CA	94804-8998	06/01/1975	30,850,146	2,498,986	20,799,436
056780-G80	SAN FRANCISCO	EMBARCADENO POSTAL CIR	200 MAIN STREET	CA	94 105-# 996	10/01/1985	44,311,257	236,887	15,903,318
056766-G04	8AM FRANCISCO	RINCON CENTER	180 STUARY STREET	CA	94119-0009	01/01/1940	6,007,325	397,000	
056768-G28	SAN FRANCISCO	VMF	1300 EVANS AVE	CA	94108-9908	07/01/1983	3,664,691	380,000	1,998,522
056786-G34	SAN FRANCISCO	PINE STREET STATION	1400 PINE ST	CA	94109-9998	01/01/1993	11,381,577	2,440,582	10,279,997
056789-G15	SAN FRANCISCO	PAO CENTER	1309 EYANS ST.	CA	94188-9998	07701/1963	61,829,145	2.074,043	41,939,056



Owned Facilities for Selected Cities

Aug 1, 1997

Fadility ID	Peet Office	Unit Hune	Otroot Address	81	Zipecde	Bidy Occ Di	Bidg Gool	Land Cost	Undepr Bei
102498-G91	WASHINGTON	USPS HOTRE BLOG	476 LENFANT PLAZA W	DC	20209-0444	97/01/1972	1,364,048		1,364,940
108000-G02	WASHINGTON	GEORGETOWN STATION	121831ST ST NW	bc	20007-9998	06/01/1966	396,138	8,000	
105000-000	WASHINGTON	NATIONAL CAPITOL STA	N CAPITOL & MASS AVE	DC	20013-9998	06/61/1914	43,000,074	451,250	12,486,025
(0800G-G28	WASHINGTON	FRIENDSHIP STATION	WISCONSIN & UPTOWN, NW	DC	20018-1999	10/01/1978	3,001,984		2,028,988
105000-031	WASHINGTON	BRIGHTWOOD WAF	CHILLUM PLACE, NW	DC	20011-0000	10/01/1981	1,881,999	310,400	1,285,287
105000-032	WASHINGTON	BROOKLAND STATION	LAWRENCE ST, NE BT 12613	DC	29017- 999 8	04/01/1976	711,385	253,514	377,428
10 9900-G3 7	WASHINGTON	CONGRESS HEIGHTS STA	SOUTHERN AVENUE	DC	20032-9996	02/01/1976	682,576	211,006	360,104
106000-G8D	WASHINGTON	CITY DELIVERY ANNEX	6209 NORTH CAPITAL ST	DC	20011-0908	10/01/1979	1,183,992	275,862	1,079,391
105001-349	WASHINGTON	P & DC	800 BRENTWOOD RD; NE.	9C	20098-9998	08/01/10/80	90,740,452	20,618,421	70,301,043
107000-301	WASHINGTON	MAIL EQUIPMENT SHOP	2136 SYH STREET NE	DC	20260-9096	03/01/1957	1,451,692	\$0,000	. 726,274
	WASHINGTON	MAIL EQUIPMENT SHOP	2136 STH STREET NE	DC	20260-8998	09/61/1967	2,427,056	٥	0



Curred Facilities for Selected Cities

Aug 1, 1997

Facility ID	Post Office	Unit Mame	Street Address	m	Zipcede	Bidg Oas Di	Bidg Cost	Land Cool	Undepr Bal
355826-391	NEW YORK	NOITATE DOGWIE	DO VERMILYEA AVENUE	NY	10034-9990	98/01/1997	810,207	32,000	16,036
366025-302	NEW YORK	AUDOBON STA	611-615 WEST 1651H 8T.	NY	10032-9998	01/01/1936	743,841	26,009	198
356025-004	HEWYORK	CANAL ST STA.	850 CANAL STREET	NY	10013-0990	01/01/1959	6,253,929	299,000	2,215,344
355025-G05	NEW YORK	CATHEDRAL STA	215 YVEST 104TH STREET	NY	10026-9986	04/01/1930	4,227,668	373,195	463,786
355025-007	NEW YORK	COLLEGE STA	217-21 WEST 146TH ST.	NY	10036-9906	01/01/1937	717,403	52,000	8,974
356026-000	NEW YORK	COOPER STA.	93 4TH AVENUE	NY	10003-9606	01/01/1936	1,860,388	134,600	55,363
356875-014	NEW YORK	GRAND CENTRAL STATION	110 EAST 45TH STREET	NY	10017-9686	08/01/1933	28,646,283	7,012,06#	15,244,270
356825-012	NEW YORK	KINCKERBOCKER STATION	128 EAST BROADNAY	NA	10002-9998	46/01/1937	1,440,464	79,000	
365826-013	NEW YORK	LENOK HILL STATION	221 EAST 70TH STREET	MY	10021-1098	01/01/1995	2,000,036	119,645	63,627
355825-G14	NEW YORK	MADISON BOUARE STA.	149-163 EAST 23RD 5T.	NY	10010-9998	00/01/1936	3,418,318	300,000	1,851,347
355825-C10	NEW YORK	OLO CHIGLISEA STATION	217 WEST 16TH STREET	NY	10011-9900	09/01/1037	2,460,182	1 52,00 0	200,603
155025-G20	NEW YORK	PLANETARIUM STATION	127 WEST 83 STREET	MY	16074-9986	01/01/1957	2,201,746	106,000	429,391
368825-636	NEW YORK	TIMES BOUARE STATION	340-346 WEST 42ND ST.	NY	10036-8998	02/01/1962	5,243,315	604,6 08	2,000,620
3568 2 5-G37	NEW YORK	GRACIE STA.	229 EAST SSYH STREET	NY	10028-0996	11/01/1954	2,376,707	430,942	1,772,636
355625-G36	NEW YORK	HELLOATE STATION	163 EAST 110 TH STREET	NY	10029-0008	91/91/1967	677,120	46,143	896,898
365525-G29	NEW YORK	LINCOLNTON STATION	2280 6TH AVENUE	NY	10037- 9896	01/01/19#0	1,467,138	105,297	962,244
355826-G40	NEW YORK	MANHATTANVILLE STA.	365 WEST 126 STREET	NY	10001-9908	01/01/1860	2,031,312	150,375	1,361,035
353875-G41	NEW YORK	TRIBOROUGH STATION	173 EAST 124TH STREET	NY	10035-0006	00/01/1975	940,250	26,005	620,601
088825-042	NEW YORK	TOMPHING SQUARE	244 EAST 3RD STREET	NY	10008-9898	00/01/1974	284,634	15,000	237,184
356825-G44	NEW YORK	FORT GEORGE STA.	4956 BROADWAY	NY	10040-0008	04/01/1954	1,853,780	109,000	1,052,333
365426-265	NEW YORK	RADIO CITY STATION	322 WEST SAND STREET	MY	10019-9994	11/01/1924	6,412,424	2,216,000	7,633,636
355825-056	NEW YORK	PECK SLIP STATION	15TH 8 T	MY	10638-9998	03/01/1990	3,370,620	\$27,056	2,949,616
355625-G 44	NEW YORK	MANHATTAN VAF-JETH ST	201 SSTH AVENUE	NY	10001-0998	04/01/1986	58,600,102	15,672,346	46,766,864
355825-061	NEW YORK	RADIO CITY 87A PRO	320 WEST 62ND STREET	NY	10019-9996			1,906,867	
385825-062	MEW YORK	MURRAY HILL ANNEX	200 EAST 30TH STREET	NY	10631-9998	03/01/1981	10,359,661	13,076,670	9,732,757
365825-044	NEW YORK	MANHATTANVILLE PKG	MONIMOSIDE AVE	NY	10029-9968			69,762	
355825-G65	NEW YORK	RADIO CITY STA ADD'L	315-315 WEST 61 STREET	NY	10015-9996			£12,01 3 ,1	
355825-007	NEW YORK	COLONIAL PARK ADJ LOT	83-91 MACOMETE PLACE	NY	10039-8098			290,000	
355825-971	NEW YORK	AMBONIA STA (BROADWAY)	1990 BROADWAY	NA	10023-8968	06/01/1956	2,099,000	7,700,607	1,841,589
385831-018	MEW YORK	MORGAN P & DC	341 NINTH AVE	NY	16199-9998	01/01/1833	121,277,142	2,031,500	66,264,619
365301-G40	NEW YORK	MANHATTAN P & DC	W 28429 BET 9810 AVE	NY		09/01/1995	231,073,720	6,760,316	216,142,551
355832-G15	NEW YORK	JAMES A FARLEY P & DO	ATH AVE & 33RD STREET	NA		01/01/1814	50,672,040	4,100,000	33,504,213
355833-G08	NEW YORK	CHURCH STREET	90 CHURCH STR	NY	10097-9998	06/01/1937	47,322,286	1,085,598	14,471,016

DMA/USPS-T9-9 Please refer to page 525 of LR H-12.

- a. Of the \$21.9 million written off between September 30, 1996 and September 30, 1995, how much of the write-off was from other government agencies?
- b. Please disaggregate the amount in a. above by agency.
- c. Of the \$26.2 million Provision for Doubtful Accounts, how much is from other government agencies?
- d. Please disaggregate the amount in c. above by agency.

- a. None of the amounts written off in FY 1996 related to government agencies.
 - b. Please see my response to a.
- c. The FY 1996 provision for doubtful accounts includes \$5.4 million related to the U.S. Government.
- d. This amount represents that portion of the revenue foregone appropriation receivable for FY 1997 that was not included in the 1997 appropriation authorization (Public Law No. 104-208). The Postal Service subsequently received this amount in June, 1997, and the accounting records and financial statements have been adjusted accordingly.

DMA/USPS-T9-10 Please refer to page 525 of LR H-12.

- a. Could the Postal service reduce uncollectibles by reviewing an aging listing of accounts receivable (AR) more often than twice a year?
- Has the Postal Service performed any studies on the costs and benefits of more frequent AR review? If so, please provide a copy of any such studies.

- a. The Postal Service currently reviews its accounts receivable more frequently than twice a year. An aged accounts receivable listing is prepared and reviewed every accounting period (28 days). Based on this ongoing analysis of receivables, the provision for doubtful accounts is adjusted twice a year.
 - b. Please see my response to part a.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 August 12, 1997